



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 21, 2020

**By ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Edinuel Rodriguez Polanco and Felipe Gonzalez*, 20 CR 237 (PKC)**

Dear Judge Castel,

The Government writes on behalf of the defendants to request respectfully an adjournment of approximately sixty days of the conference set for July 30, 2020 to a date and time that is convenient for the Court. The Government consents to this request and understands from counsel that they continue to review and consult with their clients concerning certain discovery provided to date as well as the possibility of any pre-trial motions or pre-trial dispositions, discussions that the ongoing circumstances of the coronavirus pandemic have complicated and prolonged. With the consent of the defendants, the Government requests respectfully that the Court exclude time under the Speedy Trial Act from July 30, 2020 through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interest of the public and the defendants in a speedy trial are outweighed here by the interests of the defendants in having a further time to review discovery and consider any possible pre-trial motions or pre-trial dispositions, an exclusion that the Government further submits is appropriate at this time in light of the national emergency declared over the coronavirus pandemic.

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney

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cc: Sylvie Levine (Counsel to Edinuel Rodriguez Polanco) (By ECF)  
Eric Franz (Counsel to Felipe Gonzalez) (By ECF)